

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

MAWSON INFRASTRUCTURE GROUP,
INC.

Alleged Debtor

Chapter 11

Case No. 24-12726 (MFW)

Re: D.I. 88, 139

**DECLARATION OF ANDREW K. GLENN IN SUPPORT
OF THE PETITIONING CREDITORS' AND CAMERON HAMISH GRAY'S
OPPOSITION TO DEBTOR'S MOTION (I) FOR A BOND PURSUANT TO 11 U.S.C.
§ 303(e), AND (II) FOR SANCTIONS FOR VIOLATION OF THE AUTOMATIC STAY**

I, Andrew K. Glenn hereby declare under penalty of perjury that the following statements are true and correct to the best of my knowledge, information, and belief:

1. I am the Managing Partner of Glenn Agre Bergman & Fuentes LLP ("Glenn Agre"). I am an attorney at law, duly admitted and in good standing to practice in the State of New York. Glenn Agre serves as counsel to Marshall Investments MIG Pty Ltd ("Marshall"), W Capital Advisors Pty Ltd ("W Capital"), Rayra Pty Ltd ("Rayra"), Liam Healey and Quentin Olde (the "Receivers") in their capacity as Receivers and Managers of MIG No.1 Pty Ltd (in Liq.) (Receivers and Managers Appointed) ("MIG1"), John McNerney and Phillip Campbell-Wilson (the "Mawson Services Liquidators") in their capacity as Joint and Several Liquidators of Mawson Services Pty Ltd ("Mawson Services"), and Cameron Hamish Gray (the "MIGI Liquidator"), in his capacity Liquidator of Mawson Infrastructure Group, Inc. (the "Alleged Debtor" or "Mawson").

2. I submit this declaration in support of the *Petitioning Creditors' and Cameron Hamish Gray's Opposition to Debtor's Motion (I) For a Bond Pursuant to 11 U.S.C. § 303(e), and*

(II) *For Sanctions For Violation of the Automatic Stay* (the “Opposition”),¹ filed contemporaneously herewith.

3. Attached hereto as **Exhibit A** is a copy of an excerpt from the Form 10-K filed by Mawson with the U.S. Securities and Exchange Commission on March 21, 2022, for the fiscal year ending December 31, 2021.

4. Attached hereto as **Exhibit B** is a copy of an excerpt from the Form 10-K filed by Mawson with the U.S. Securities and Exchange Commission on March 23, 2023, for the fiscal year ending December 31, 2022.

5. Attached hereto as **Exhibit C** is a copy of an excerpt from the Form 10-K filed by Mawson with the U.S. Securities and Exchange Commission on April 1, 2024, for the fiscal year ending December 31, 2023.

6. Attached hereto as **Exhibit D** is a copy of the letter report from Quinn Emanuel Urquhart & Sullivan, dated March 11, 2024, memorializing its findings and observation in connection with an internal investigation conducted on behalf of the Audit Committee of Mawson.

7. Attached hereto as **Exhibit E** is a copy of an excerpt from the Form 10-K filed by Mawson with the U.S. Securities and Exchange Commission on March 28, 2025, for the fiscal year ending December 31, 2024.

8. Attached hereto as **Exhibit F** is a copy of ASIC Form 507 – Part A Appendix, filed with the Australian Securities and Investments Commission on March 27, 2024.

9. Attached hereto as **Exhibit G** is a copy of ASIC Form 507 – Part A Appendix, filed with the Australian Securities and Investments Commission on March 13, 2024.

¹ Capitalized terms used but not otherwise defined herein have the meaning ascribed to them in the Opposition.

10. Attached hereto as **Exhibit H** is a true and correct copy of a letter from Glenn Agre to the Alleged Debtor, dated October 23, 2024.

11. Attached hereto as **Exhibit I** is a true and correct copy of the Complaint filed in the case captioned *Mawson Infrastructure Group, Inc. v. Mewawalla*, C.A. No. 2025-0789-JTL (Del. Ch. 2025).

12. Attached hereto as **Exhibit J** is a copy of the *Order* of the New South Wales Registry, Federal Court of Australia, dated February 11, 2025, in Case No. NSD1395/2024.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: July 25, 2025

/s/ Andrew K. Glenn
Andrew K. Glenn, Esq.